

**SheppardMullin**

MEMO ENDORS

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September 27, 2022

**VIA ECF**

The Hon. Kenneth M. Karas  
United States District Court  
Southern District of New York  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

Re: *Lawrence v. Northwell Health, Inc.*, Case No. 19-CV-7448 (KMK) (JCM)

Dear Judge Karas:

We represent Defendant, Northwell Health, Inc. We write to request a brief extension of time for the filing of motions *in limine* with respect to the parties' expert witnesses in this matter.

Pursuant to Your Honor's August 26, 2022 Order (Dkt. 110), the parties were directed, among other things, to file all motions *in limine*, proposed voir dire, joint proposed jury instructions, and a joint verdict form by September 30, 2022.

On August 14, 2022, Plaintiff served notice designating two individuals, Dr. Henry Okere and Nicole Nardizzi, LCSW, as expert witnesses in this matter. Defendant served notice of its responses and objections to Plaintiff's expert designations on August 26, 2022. On September 13, 2022, Defendant served notice designating its own expert, Dr. Stuart Kleinman. The parties have since agreed to conduct pre-trial depositions of Plaintiff's experts, tentatively scheduled for October 6, 2022.

Since Defendant will not depose Plaintiff's designated experts until on or about October 6, we cannot determine at this time whether a motion *in limine* is necessary with respect to their testimony and/or any documents Plaintiff may wish to introduce at trial with respect to their treatment of Plaintiff and their evaluation of his alleged damages. Dr. Kleinman is also not able to prepare his own report until after such depositions are complete.

In light of the foregoing, we respectfully request that Defendant's time to file motions *in limine* with respect to Plaintiff's experts be extended up to and including October 13, 2022, with any responses to such *in limine* motions due on or before October 18, 2022, and that Plaintiff's motions *in limine* with respect to Defendant's expert be due within seven days of service of such expert's report, with any response to Plaintiff's motion due within five days after filing. Defendant does not request any other modifications to the Court's August 26 Scheduling Order, including the September 30 deadline for all other *in limine* motions. Plaintiff's counsel consents to this request.

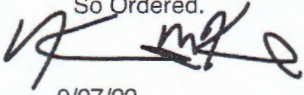
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The Hon. Kenneth M. Karas  
September 27, 2022  
Page 2

Thank you for the Court's attention to this matter.

Granted.

So Ordered.



9/27/22

Respectfully submitted,

/s/ Jonathan Stoler

Jonathan Stoler  
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:4857-7774-9557.1

cc: All Counsel of Record